

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TITUS INTERNATIONAL PLC,

Plaintiff,

v.

HARDWARE RESOURCES, A DIVISION OF  
PROGRESSIVE STAMPING & PLATING, INC.,

Defendant.

Case No. 08-cv-2158 (WHP)

MOTION TO ADMIT COUNSEL  
PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District

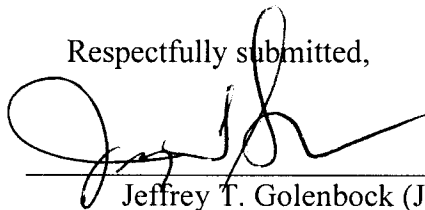
Court for the southern District of New York, I, Jeffrey T. Golenbock, a member in good  
standing of the bar of this Court, hereby move for an Order allowing the admission pro hac  
vice of :

George R. Schultz  
Schultz & Associates, P.C.  
5400 LBJ Freeway, Suite 1200  
Dallas, Texas 75240  
214.210.5940 (telephone)  
214.210.5941 (facsimile)

There are no pending disciplinary proceedings against George R. Schultz in any State or Federal  
Court.

Dated: New York, New York  
June 20, 2008

Respectfully submitted,



Jeffrey T. Golenbock (JG 2217)

437 Madison Avenue  
New York, New York 10022  
(212) 907-7300 (phone)  
(212) 754-0777 (fax)  
Attorneys for Defendant Hardware Resources

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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Plaintiff,

v.

HARDWARE RESOURCES, A DIVISION OF  
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INC.,

Defendant.

Case No. 08-cv-2158 (WHP)

DECLARATION OF JEFFREY T.  
GOLENBOCK IN SUPPORT OF  
MOTION TO ADMIT COUNSEL  
PRO HAC VICE

Jeffrey T. Golenbock hereby declares as follows:

1. I am a member of Golenbock Eiseman Assor Bell & Peskoe LLP, counsel for Defendant in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's Motion to Admit George R. Schultz, Esq. Counsel Pro Hac Vice to represent the Defendant in this matter.

2. I am a member in good standing of the bars of the State of New York, and the United States District Court for the Southern District of New York. I was admitted to practice law in New York State in September 1977, and was admitted to the Southern District bar on April 1979.

3. Mr. Schultz is a member of the firm of Schultz & Associates in Dallas, Texas. I have known Mr. Schultz since 2007 and have worked with him in regards to another legal matter.

4. Mr. Schultz is a member in good standing of the Texas State Bar, and there are no pending disciplinary actions against him in any State or Federal court. I have attached

as Exhibit A a copy of a certificate of good standing in that bar. Mr. Schultz is prepared to comply with all rules of conduct applicable to lawyers admitted to practice in the Southern District of New York as well as the Individual Practices of this Court.

5. I have found Mr. Schultz to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

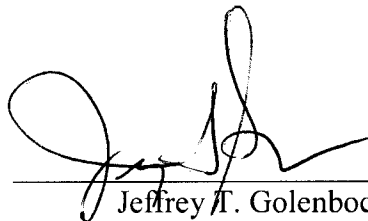
6. I have spoken to Michael Aschen of Abelman Frayne & Schwab, counsel for plaintiff in this action, and Mr. Aschen has authorized me to say that he has no objection to this motion.

7. Accordingly, I am pleased to move the admission of George R. Schultz, pro hac vice, and it is respectfully requested that the motion to admit George R. Schultz, pro hac vice, to represent Defendant in the above captioned matter, be granted.

8. I respectfully submit a proposed order granting the admission of George R. Schultz, pro hac vice, which is attached hereto as Exhibit B.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: New York, New York  
June 20, 2008



Jeffrey T. Golenbock (JG 2217)

# The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

**George Russell Schultz**

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 3rd day of November, 1989.

I further certify that the records of this office show that, as of this date

**George Russell Schultz**

is presently enrolled with the State Bar of Texas as an active member in good standing.

**IN TESTIMONY WHEREOF** witness my hand

and the seal of the Supreme Court of  
Texas at the City of Austin, this, the  
24th day of June, 2008.

**BLAKE HAWTHORNE**, Clerk

by *Brad Sonogo*  
**Brad Sonogo**, Deputy Clerk

No. 0624H

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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Defendant.

Case No. 08-cv-2158 (WHP)

ORDER FOR ADMISSION PRO  
HAC VICE ON WRITTEN MOTION

Upon the motion of Jeffrey T. Golenbock, attorney for Defendant Hardware Resources, and said sponsor attorney's declaration in support:

**IT IS HEREBY ORDERED** that

George R. Schultz  
Schultz & Associates, P.C.  
5400 LBJ Freeway, Suite 1200  
Dallas, Texas 75240  
214.210.5940 (telephone)  
214.210.5941 (facsimile)  
[russ@grspsc.com](mailto:russ@grspsc.com)

is admitted to practice pro hac vice as counsel for Defendant Hardware Resources in the above captioned case in the United States District Court for the southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the "Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: New York, New York  
June 20, 2008

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United States district/Magistrate Judge

**UNITED STATES DISTRICT COURT  
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Defendant.

Case No. 08-cv-2158 (WHP)

STATE OF NEW YORK     )  
  ) ss:  
COUNTY OF NEW YORK    )

NICHOLAS S. FELTHAM, being duly sworn, deposes and says:

1. I am over the age of 18 years, and am not a party to this proceeding. I reside in Kings County, New York.

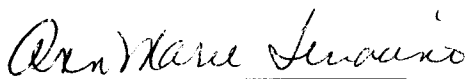
2. On June 20, 2008, I served a copy of the *Motion to Admit Counsel Pro Hac Vice* and the *Declaration of Jeffrey T. Golenbock in Support of Motion to Admit Counsel Pro Hac Vice* via U.S. Postal Service First Class Mail on:

Michael Aschen, Esq.  
Abelman Frayne & Schwab  
666 Third Avenue  
New York, NY 10017  
(212) 949-9022  
*Attorney for Plaintiff*



Nicholas S. Feltham

Sworn to before me this  
20<sup>th</sup> day of June, 2008

  
Notary Public

**ANN MARIE TERRACINO**  
Notary Public State of New York  
No. 01TE6111281  
Qualified in Richmond County  
Commission Expires June 7, 2012